

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

UNITED STATES OF AMERICA

v.

Cr. No. 1:12-cr- 167-01/02/03-SM

THOMAS J. DUNN

WILLIE ORTIZ

QUENTIN SIMON

INDICTMENT

Count One

(18 U.S.C. § 922 (a)(6) - Making a False Statement during the Acquisition of a Firearm)

From on or about March 26, 2010, in the District of New Hampshire, the defendant,

THOMAS J. DUNN

in connection with the acquisition of a Ruger, model P97, .45 caliber pistol bearing serial number 633-31014 from Wildlife Taxidermy and Sport Center, a federally licensed firearms dealer, knowingly made a false and fictitious written statement to Wildlife Taxidermy and Sport Center, which statement was likely to deceive the firearms dealer, as to a fact material to the lawfulness of such acquisition of the firearm by the Defendant, in that the Defendant represented that he was the actual purchaser of the firearm when in fact, he purchased the firearm for another person, in violation of Title 18, United States Code, Sections 922(a)(6).

The Grand Jury further charges:

Count Two

(18 U.S.C. § 922 (a)(6) - Making a False Statement during the Acquisition of a Firearm)

From on or about April 1, 2010, in the District of New Hampshire, the defendant,

THOMAS J. DUNN

in connection with the acquisition of a Hi-Point, model CF380, 380 caliber pistol bearing serial number P8015903 and a Hi-Point, model JHP-45, .45 caliber pistol bearing serial number X4136112 from Wildlife Taxidermy and Sport Center, a federally licensed firearms dealer, knowingly made a false and fictitious written statement to Wildlife Taxidermy and Sport Center, which statement was likely to deceive the firearms dealer, as to a fact material to the lawfulness of such acquisition of the firearms by the Defendant, in that the Defendant represented that he was the actual purchaser of the firearms when in fact, he purchased the firearms for another person, in violation of Title 18, United States Code, Sections 922(a)(6).

Count Three

(18 U.S.C. § 922 (a)(6) - Making a False Statement during the Acquisition of a Firearm)

From on or about April 22, 2010, in the District of New Hampshire, the defendant,

THOMAS J. DUNN

in connection with the acquisition of a Hi-Point, model C9, 9mm pistol bearing serial number P1248644 from Wildlife Taxidermy and Sport Center, a federally licensed firearms dealer, knowingly made a false and fictitious written statement to Wildlife Taxidermy and Sport Center, which statement was likely to deceive the firearms dealer, as to a fact material to the lawfulness of such acquisition of the firearm by the Defendant, in that the Defendant represented that he was the actual purchaser of the firearm when in fact, he purchased the firearm for another person, in violation of Title 18, United States Code, Sections 922(a)(6).

Count Four

(18 U.S.C. § 922 (a)(6) - Making a False Statement during the Acquisition of a Firearm)

From on or about April 23, 2010, in the District of New Hampshire, the defendant,

THOMAS J. DUNN

in connection with the acquisition of an ATI, model HP-9, 9mm pistol bearing serial number TO620-08A05295 from Riley's Sport Shop, Inc., a federally licensed firearms dealer, knowingly made a false and fictitious written statement to Riley's Sport Shop, Inc., which statement was likely to deceive the firearms dealer, as to a fact material to the lawfulness of such acquisition of the firearm by the Defendant, in that the Defendant represented that he was the actual purchaser of the firearm when in fact, he purchased the firearm for another person, in violation of Title 18, United States Code, Sections 922(a)(6).

Count Five

(18 U.S.C. § 922 (g)(3): Unlawful User in Possession of a Firearm)

From on or about August 19, 2011, in the District of New Hampshire, the defendant

WILLIE ORTIZ

having been an unlawful user of marijuana, a controlled substance, did knowingly and intentionally possess a Smith & Wesson, model SW40VE, .40 caliber pistol bearing serial number DTT2563, which had been shipped or transported in interstate commerce or foreign commerce, in violation of Title 18, United States Code, Section 922(g)(3).

Count Six

(18 U.S.C. § 922 (g)(3): Unlawful User in Possession of a Firearm)

From on or about September 7, 2011, in the District of New Hampshire, the defendant

QUENTIN SIMON

having been an unlawful user of marijuana, a controlled substance, did knowingly and intentionally possess a Ruger, model P345, .45 caliber pistol bearing serial number 664-25682, which had been shipped or transported in interstate commerce or foreign commerce, in violation of Title 18, United States Code, Section 922(g)(3).

Count Seven

(21 U.S.C. § 841(a)(1): Possession with Intent to Distribute Cocaine Base)

From on or about September 7, 2011, in the District of New Hampshire, defendant,

QUENTIN SIMON

did knowingly or intentionally possess with intent to distribute or dispense, a controlled substance, to wit cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

Dated: December 12, 2012

A TRUE BILL

/s/ Foreperson
Foreperson of the Grand Jury

JOHN KACAVAS
United States Attorney
District of New Hampshire

/s/ Debra M. Walsh
By: Debra M. Walsh
Assistant U.S. Attorney